

EXHIBIT F

DECLARATION OF

MICHAEL J. HUI

From: [Kaounis, Angelique](#)
To: [Michael J. Hui](#)
Cc: [Snyder, Orin](#); [Krevitt, Josh](#)
Subject: RE: Zhongjie "Jay" Li and Proception
Date: Monday, June 9, 2025 5:25:51 PM
Attachments: [image001.png](#)
[shield-advisory.png](#)
[chevron-light.png](#)

☐ External email ☐

Thank you.

Angelique Kaounis
[Partner](#)

T: +1 310.552.8546 | M: +1 213.479.1946
AKaounis@gibsondunn.com

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
2000 Avenue of the Stars Suite 1200N, Los Angeles, CA 90067-4700

From: Michael J. Hui <mhui@gunder.com>
Sent: Monday, June 9, 2025 5:17 PM
To: Kaounis, Angelique <AKaounis@gibsondunn.com>
Cc: Snyder, Orin <OSnyder@gibsondunn.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>
Subject: RE: Zhongjie "Jay" Li and Proception

Hi Angelique,

I do not know at this time. If litigation counsel has been engaged, I will share their contact information when I have it.

My best,

Michael

Michael J. Hui (he/him)

mhui@gunder.com
Direct: [415 801 4876](tel:4158014876)
Cell: [415 215 3820](tel:4152153820)
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GUNDERSON DETTMER STOUGH VILLENEUVE FRANKLIN & HACHIGIAN, LLP

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From: Kaounis, Angelique <AKaounis@gibsondunn.com>

Sent: Monday, June 9, 2025 3:23 PM

To: Michael J. Hui <mhui@gunder.com>

Cc: Snyder, Orin <OSnyder@gibsondunn.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>

Subject: RE: Zhongjie “Jay” Li and Proception

Hi Michael,

Thanks very much for your email.

Do you know if Mr. Li and/or Proception have litigation counsel? If so, could you please forward their contact information?

Thank you,

Angelique

Angelique Kaounis

Partner

T: +1 310.552.8546 | M: +1 213.479.1946

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From: Michael J. Hui <mhui@gunder.com>

Sent: Monday, June 9, 2025 2:56 PM

To: Kaounis, Angelique <AKaounis@gibsondunn.com>

Cc: Snyder, Orin <OSnyder@gibsondunn.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>

Subject: RE: Zhongjie “Jay” Li and Proception

Hello Angelique,

As I mentioned to Tesla’s in-house legal team, Gunderson does not have a litigation practice and cannot represent the company for purposes of any litigation.

Thanks,

Michael

Michael J. Hui (he/him)

mhui@gunder.com
Direct: 415 801 4876
Cell: 415 215 3820
San Francisco
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From: Kaounis, Angelique <AKaounis@gibsondunn.com>

Sent: Monday, June 9, 2025 2:41 PM

To: Michael J. Hui <mhui@gunder.com>

Cc: Snyder, Orin <OSnyder@gibsondunn.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>

Subject: Zhongjie “Jay” Li and Proception

Dear Counsel,

Please see the attached letter.

We look forward to your prompt response.

Thank you,

Angelique

Angelique Kaounis

Partner

T: +1 310.552.8546 | M: +1 213.479.1946

AKaounis@gibsondunn.com

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